

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

ONLY AL-KHIDHR

PLAINTIFF

VERSUS

CAUSE NO.: 1:07-CV-01223-LG-RHW

**HARRISON COUNTY, MISSISSIPPI, by and through its
Board of Supervisor; HARRISON COUNTY SHERIFF,
George Payne, in his official capacity; SUPERVISOR
OF BOOKING, CAPTAIN RICK GASTON, acting
under of state law; CORRECTIONS OFFICER
SERGEANT RYAN TEEL, acting under
color of state law; CORRECTIONS OFFICER MORGAN
THOMPSON, acting under color of state law; CORRECTIONS
OFFICER THOMAS MOORE, acting under color of state law**

DEFENDANTS

**PLAINTIFF'S DESIGNATION
OF EXPERT WITNESSES FOR TRIAL**

COMES NOW, Only Al-Khidhr, the Plaintiff in the above styled and numbered cause, and files this his Plaintiff's Designation of Expert Witnesses for Trial and designates the following expert witnesses whom he anticipates may testify, live or by deposition according to availability at the time of trial.

1. Barry M. Crown, PhD

Dr. Crown is a licensed psychologist in the state of Florida. He is considered an expert in the field of Post Traumatic Stress Disorder and the treatment of brain injuries. Dr. Crown's *curriculum vitae* is attached hereto as Exhibit" 1" and incorporated by reference. Dr. Crown is expected to testify concerning the effects following torture and/or mistreatment of a detained person in a controlled environment. At this time Dr. Crown's report is unavailable. This designation will be supplemented and any and all reports to which Defendants are entitled will be provided.

Dr. Crown's fee schedule is as follows: \$3500 Neuropsychological evaluation (including report); \$375 per hour records review, conferences; \$475 per hour for depositions and court appearances (to maximum of \$3500 per day). The fees do not include expenses.

2. William Drechsel

Mr. William Drechsel was a Sergeant and Director of the Field Training Officer Program for the Harrison County Sheriffs Department. He was primarily assigned to work at the Harrison County Adult Detention Center. His fields of expertise include: Field Training Officer, State Law Enforcement Instructor, in and out processing of Inmates, booking procedures and classification of inmates and detainees, C.E.R.T. (Correctional Emergency Response Team) Procedures, use of force and jail/prison accreditation. William Drechsel's *curriculum vitae* is attached as Exhibit "2" and incorporated by reference. He has not issued a report. Plaintiff reserves the right to supplement this information as needed.

Mr. Drechsel's fee schedule is as follows: \$3000 expert witness fees, billed at the rate of \$150 per hour for court appearance, \$125 per hour for out-of-court work. His travel is \$50 per hour plus expenses.

3. Thomas H. Christiansen, M.Ed., CRC, CDMS, CLCP, LPC

Mr. Thomas H. Christiansen is currently employed as a vocational consultant with Carlisle and Associates in Mobile, Alabama. He is expected to give testimony regarding the injuries suffered by the Plaintiff and the cost and anticipated effectiveness of rehabilitative treatment. He may also give testimony about future lost wages. A copy of his *curriculum vitae* is attached as Exhibit "3" and incorporated by reference.

4. Treating Physicians

The Plaintiff may call any and/or all of his treating physicians to testify that the medical treatment rendered was necessary and proper. They may also give an opinion as to prognosis for recovery. No reports have been issued.

The known treating physicians as follows:

RESPECTFULLY SUBMITTED, this the 15th day of July, 2009.

ONLY AL-KHIDHR
Plaintiff

BY: CHASE CHASE & ASSOCIATES, PLLC

BY: /s/Alvin Chase
ALVIN CHASE (MSB #5968)

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D'Iberville, MS 39540
Phone: 228-396-3300
Facsimile: 228-396-1494

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that I have this day electronically filed a true and correct copy of Plaintiff's Designation of Expert Witnesses for Trial with the Clerk of Court using the ECF system which sent notification of such filing to the following:

Karen Jobe Young
Meadows Law Firm
P.O. Box 1076
Gulfport, MS 39502

Ian A. Brendel
Jim Davis, P.A.
P.O. Box 1521
Gulfport, MS 39502

Cyril T. Faneca
Haley Necaie Broom
Joe Crawford Gewin
Dukes, Dukes, Keating & Faneca
P.O. Drawer W
Gulfport, MS 39502-0680

George D. Hembree, III
McGlinchey Stafford
P.O. Drawer 22949
Jackson, MS 39225-2949

James L. Davis, III
P.O. Box 1839
Gulfport, MS 39502-1839

Robert H. Pedersen
Watkins & Eager
P.O. Box 650
Jackson, MS 39205-0650

Dated, this the 15th day of July, 2009.

/s/Alvin Chase
ALVIN CHASE

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